

**UNITED STATES DISTRICT COURT**  
for the  
**Eastern District of Michigan**

United States of America

v.

Christopher Robertson

Case: 2:22-mj-30364

Assigned To : Unassigned

Assign. Date : 08/25/2022

CMP: USA v ROBERTSON (MAW)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 24, 2022 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section*

*Offense Description*

18 U.S.C. § 922(g)(1)

Felon in posession of a firearm

This criminal complaint is based on these facts:

Continued on the attached sheet.

*Complainant's signature*

Special Agent Marquis Shannon, A.T.F.

*Printed name and title*

*Judge's signature*

Hon. Elizabeth A. Stafford, U.S. Magistrate Judge

*Printed name and title*

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: August 25, 2022

City and state: Detroit, Michigan

**AFFIDAVIT IN SUPPORT OF  
AN APPLICATION FOR A CRIMINAL COMPLAINT**

I, Special Agent Marquis Shannon, being duly sworn, depose and state the following:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and have been employed with the ATF for more than eight years. As a Special Agent, I am currently assigned to the Detroit Field Office. I have conducted or participated in numerous criminal investigations focused on firearms and narcotics violations. I am a graduate of the Criminal Investigator Training Program and the ATF Special Agent Basic Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. Prior to my employment with ATF, I was employed as a State Trooper with the Ohio State Highway Patrol for approximately seven-and-a-half years from 2006 through 2014. I earned a bachelor's degree from The Ohio State University.

2. I make this affidavit from personal knowledge based on my participation in this investigation, including reports from other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. The information outlined below is provided for the limited purpose of

establishing probable cause and does not contain all details or all facts of which I am aware relating to this investigation.

3. I am currently investigating previously convicted felon, Christopher ROBERTSON, (D.O.B. XX/XX/1985) for federal firearms violations. As detailed below, there is probable cause to believe that ROBERTSON knowingly possessed a firearm, in violation of 18 U.S.C. § 922(g)(1).

**PROBABLE CAUSE**

4. On August 24, 2022, at approximately 4:00 am, Detroit Police Department (DPD) officers were dispatched to a residence on Fenmore Street Detroit, MI. Upon arriving at the scene, responding officers heard approximately 5-6 gunshots being fired near their location. According to the report, witnesses contacted the Detroit Police Department and advised they could see the shooter, later identified as Christopher ROBERTSON, firing multiple shots out of the window of a residence near that location on Southfield Freeway.

5. Officers used a loudspeaker to order the occupants of the Southfield Freeway home to exit the residence. ROBERTSON exited the building and was subsequently arrested by officers. Officers also ordered the remaining occupants, (one adult and six juveniles) to come out of the residence. The remaining occu-

pants complied and exited the home. Witnesses near the scene identified ROBERTSON as the person that was shooting inside and outside of the residence. Officers conducted a protective sweep of the Southfield Freeway residence. During the protective sweep, officers observed a case of 9mm bullets and a loaded firearm magazine laying on top of a bed in the northwest bedroom. Shortly after, officers obtained a search warrant for the residence. During the execution of the search warrant, officers recovered a Sig Sauer, model P226, 9mm, semiautomatic pistol, seven spent 9mm bullet casings, a Sig Sauer magazine containing four rounds of ammunition, and a partially empty fifty-round box of 9mm ammunition that contained 16 live rounds of ammunition.

6. During this investigation, I reviewed data from the National Crime Information Center (NCIC), which revealed ROBERTSON had been previously convicted of the following felony crimes:

- a. 2010 - Delivery and Manufacture of a Controlled Substance -6<sup>th</sup> Circuit Court of Michigan, Pled Guilty.
- b. 2017 – Malicious Destruction of Person Property – 16<sup>th</sup> Circuit Court of Michigan, Pled Guilty.

7. I know that under the Michigan Court Rules, before accepting a guilty plea the court must advise the defendant of the maximum possible penalty. Because ROBERTSON pled guilty to the above-listed felony offenses, there is probable cause that he knew at the time he possessed the firearm he had previously been convicted of at least one offense that was punishable by imprisonment for more than one year.

8. An NCIC inquiry of the recovered Sig Sauer pistol revealed the firearm had previously been reported stolen.

9. On August 24, 2022, I contacted ATF Interstate Nexus Expert and Special Agent Michael Jacobs, regarding the status of the Sig Sauer P226 pistol. Special Agent Jacobs stated the firearm, based on the description provided, without conducting a physical examination, was manufactured outside of the state of Michigan after 1898, and therefore had traveled in and affected interstate commerce.

### **CONCLUSION**

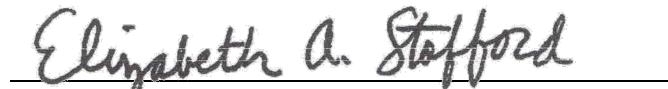
10. Based on the aforementioned facts, there is probable cause to believe Christopher ROBERTSON (XX/XX/1985), a previously convicted felon, aware of his felony convictions, did knowingly possess, in and affecting interstate commerce, a Sig Sauer, model P226, 9mm, semiautomatic pistol; in violation of 18

U.S.C. § 922(g)(1) – felon in possession of a firearm: said violation occurring on or about August 24, 2022, in the Eastern Judicial District of Michigan.



Marquis Shannon  
Special Agent, ATF

Sworn to before me and signed in my presence  
And/or by reliable electronic means.

  
Hon. Elizabeth A. Stafford  
United States Magistrate Judge

Dated: August 25, 2022